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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF MARCELA VILLEDA
SANCHINELLI IN SUPPORT OF
SUPPLEMENT TO MOTION FOR
COMPLIANCE [ECF 286]**

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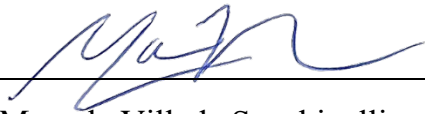
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DECLARATION OF MARCELA VILLEDA SANCHINELLI

I, Marcela Villeda Sanchinelli, hereby declare:

1. I am over the age of eighteen, and I am competent to make this declaration. I provide this declaration based upon my personal knowledge. If called as a witness, I would and could competently testify to the facts stated herein.
2. I am an attorney at Grossman Young & Hammond, an internationally ranked top immigration law firm based in Bethesda, Maryland.
3. Grossman Young & Hammond's clients include numerous Venezuelan TPS holders.
4. Following the September 5, 2025 ruling in *National TPS Alliance v. Noem*, Case No. 25-cv-01766-EMC, my colleagues and I have been working to assist our Venezuelan TPS holder clients to re-register to extend their TPS through October 2, 2026, pursuant to the January 17, 2025 extension.
5. On Monday and Tuesday of this week, I and other colleagues were able to use our online USCIS accounts to prepare and save draft TPS re-registration applications (Form I-821) for our Venezuelan TPS holder clients.
6. However, this morning, when I and another colleague logged into our USCIS accounts and attempted to submit those saved applications, we received error messages instructing us to check the "Getting Started" portion of the online application. This section contains the question, "What is the name of the designated TPS country under which you are applying?" with a drop down menu listing TPS-designated countries. Whereas before, registrants could select Venezuela, as of this morning, that option no longer appears.
7. This revision has frustrated my office's efforts to complete online re-registration applications for our Venezuelan TPS holder clients by the September 10, 2025 deadline.

1 I declare under penalty of perjury that the foregoing is true and correct, and that this
2 declaration was executed at Fairfax, Virginia this 10th day of September, 2025.

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5 Marcela Villeda Sanchinelli